

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	CR. NO. 2:18-CR-249-WKW-WC-1
	)	
WILLIAM E. HENRY	)	

**MOTION TO DECREASE DEFENDANT'S OFFENSE LEVEL PURSUANT TO**  
**UNITED STATES SENTENCING GUIDELINE § 3E1.1(b)**  
**FOR ACCEPTANCE OF RESPONSIBILITY**

Comes now the United States of America, by and through Louis V. Franklin, Sr., United States Attorney for the Middle District of Alabama, and files the above-captioned motion, and as reasons therefore, submits the following:

1. The defendant qualifies for a reduction in his sentence pursuant to U.S.S.G. § 3E1.1(b) because he assisted authorities in the investigation and prosecution of his own misconduct by timely notifying authorities of his intention to enter a plea of guilty, thereby permitting the United States to avoid preparing for trial and permitting the government and this Court to allocate their resources efficiently.
2. Accordingly, pursuant to U.S.S.G. § 3E1.1(b), the United States respectfully moves this Court to reduce the defendant's offense level by one (1) level. Combined with the two (2) level reduction applied to the defendant's offense level pursuant to U.S.S.G. § 3E1.1(a), a total reduction of three (3) levels should be applied to the defendant's offense level for his acceptance of responsibility.

Respectfully submitted this the 25th day of April, 2019.

LOUIS V. FRANKLIN, SR.  
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I, Jonathan S. Ross, Assistant United States Attorney, hereby certify that on this the 25th day of April, 2019, I filed the foregoing with the Clerk of the Court through the CM/ECF system, which will provide notification of such filing to counsel for defendant.

Respectfully submitted,

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